

**REMARKS**

Claims 1-25 are all of the claims presently pending in the application. Claims 1-12, 15-17, and 19-25 are allowed. Claims 13, 14, and 18 stand rejected under 35 USC §102(e) as anticipated by US Patent 6,490,259 to Agrawal et al.

It is noted that Applicant specifically states that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

The prior art rejection is respectfully traversed in view of the following discussion.

**I. THE CLAIMED INVENTION**

Applicant's invention, as disclosed and claimed in independent claim 13, is directed to a route updating method for a micromobility network, wherein routers are connected in a tree configuration having a plurality of layers and extending up in layers to a root router connected to an external network and radio base stations are connected to the routers in a lowest layer of said tree configuration, including receiving, in a router in a layer of the tree, a routing updating notification packet from a next lower layer and updating the routing in the router. The packet includes an update reaching range defining a highest level in the tree connection to which the updating notification is to be transmitted.

The conventional method described beginning at line 14 of page 1 of the specification requires that the routing updates be reflected all the way back to the root node of the tree.

In contrast, the present invention provides a method by which an updated routing is transmitted up the tree configuration only to the level in the tree configuration necessary to reflect the updated routing, thereby reducing the amount of resources needed for processing updating notifications. Moreover, because each layer receiving the update notification packet from the next lower layer will be able to determine whether it should forward the packet to the next higher layer, the method of the present invention is readily scalable.

**II. THE PRIOR ART REJECTIONS**

The Examiner alleges that Agrawal anticipates the present invention as defined by claims 13, 14, and 18. However, Applicants submit that claims 13 and 18, as amended solely to attempt to enhance the Examiner's understanding, defines at least one feature that is not

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present in Agrawal.

Specifically, the Examiner considers, as best understood, that the description in column 4 concerning subnets and domains satisfy the claim limitations in claims 13 and 18 concerning a tree configuration. However, even if such hierarchical structure is construed in this description, Applicants submit that the description in lines 14-45 of column 12 fails to satisfy the description in the claim that there is an update reaching range included in each notification packet that defines the highest level of the tree to which the notification packet is to be transmitted. If the Examiner wishes to persist in this rejection, it is requested that the precise location in these lines be identified so that a proper response can be considered.

Hence, turning to the clear language of the claims, in Ramjee there is no teaching or suggestion of: "... wherein routers are connected in a tree configuration having a plurality of layers and extending up in layers to a root router connected to an external network and radio base stations are connected to the routers in a lowest layer of said tree configuration, said route updating method comprising: receiving, in a router in a layer of said tree, a routing updating notification packet from a next lower layer and updating said routing in said router, said packet including an update reaching range defining a highest level in said tree connection to which said updating notification is to be transmitted", as required by claim 13. Claim 18 has similar language.

For at least the reasons stated above, Applicants respectfully submit that Agrawal fails to teach or suggest every feature of claims 13, 14, and 18, and that, therefore, these claims are clearly patentable over this reference.

Therefore, the Examiner is respectfully requested to withdraw the rejection currently of record for claims 13, 14, and 18.

Further, the other prior art of record has been reviewed, but it too even in combination with Agrawal, fails to teach or suggest the present invention as described by the claims.

### **III. FORMAL MATTERS AND CONCLUSION**

In view of the foregoing, Applicant submits that claims 1-25, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

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Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview.

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

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